Docket ID ED-2025-0151

August 25, 2025

The National Association for the Education of Young Children (NAEYC) is a professional association with a membership that includes approximately 50,000 early childhood educators, faculty members, students, advocates, and allies across the country. Our mission is to increase access to high-quality early childhood education for all children birth through age 8 and to support those working within the early childhood education profession.

Members of the early childhood education (ECE) profession, like other professions, require complex skills and knowledge to effectively support the individuals they are serving.[i] In the case of the early childhood profession they are supporting the care and education of young children, birth through age 8. Like other professions, these complex skills and knowledge are articulated in a set of core competencies for which the ECE profession relies on higher education institutions, specifically the early childhood education degree programs within them, to prepare individuals for practice. Like many other professions, such as nursing, law enforcement, social work, and the military, early childhood educators are providing essential services to the public, though the wages in these professions do not always reflect the essential, skilled nature of their work. And, like many other professions, obtaining discipline-specific degrees increases professionals' opportunities for career and wage advancement within their professions.

Early childhood educators need and value higher education credentials[ii]; indeed almost 80% hold degrees or have some college credits.[iii] The cost of higher education, though, is often a barrier to accessing the ECE degrees they seek. There are many states that offer scholarships or grants to current and prospective early childhood educators to help minimize or fully defray the cost of an ECE degree, given the low wages in the profession. However, these programs are not available in every state and, if available, they may not be available to every eligible ECE student because of funding constraints.[iv] Hence, many educators, including early childhood educators, rely on student loans to access higher education. Approximately 60% of K-12 educators (including those that work in K-3 classrooms) borrow money to complete their education degrees.[v] Additionally, a 2023 RAPID survey found that over 20% of early childhood educators working in birth through five settings have student loans.[vi] **As such we urge the Department to ensure that regulations for the low earning outcome provision facilitate rather than limit current and prospective early childhood educators' access to early childhood education degrees.** We are concerned that limiting access to these higher education programs could negatively impact current and prospective ECE higher education students, the professional programs that prepare them, and the quality and supply of child care across the country. We have six primary considerations for the regulations:

Consideration #1: Regulations should allow for maximum flexibility for students using federal student loans to choose and afford programs aligned to their education and career interests and to reduce the administrative burden for higher education institutions complying with the reporting and tracking requirements related to which programs are eligible for federal student loans. As such, we urge the Department to define "program" using the two- or four-digit CIP code rather than the six-digit code or by individual degree program. The implementation of the low earning outcome provision will increase the burden on students changing majors to not only track the impact on college credits they need and the impact on their timeline to graduation but also to track if the degree programs they seek are eligible to participate in the federal student loan program. Approximately a third of all students change their majors at least once within their first three years of enrollment. Additionally, about 10% of students change their majors more than once.[vii] Defining "program" more broadly allows students, including early childhood students, to more easily change their majors or degree programs within a CIP code without concern it could impact their access to federal student loans. If students are no longer eligible for federal student loans in the degrees they seek this may cause them to drop out of college or pause their studies while they seek other means of funding, which might include taking out private loans at much higher interest rates.

Given that the status of "federal student loan eligible" programs may change year to year, this also increases the burden on higher education institutions – including their student aid offices, registrars, advising personnel, and faculty– to accurately track programs' status and advise students about their federal financial aid options across programs. The more minutely "program" is defined the more this increases the potential for confusion about which programs, in a given year, are eligible to participate in the federal student loan program. Defining "program" more broadly allows institutions to expend their personnel and financial resources on supporting students in meeting their education goals rather than managing the administrative requirements of this provision.

Consideration #2: Regulations should ensure the accuracy and relevance of the wage data used to set the threshold of wage comparisons for graduates as well as of the data used to determine graduates' earnings. The legislation calls for comparing the wages of graduates of associate and baccalaureate degree programs to the median wage of individuals who hold solely a high school diploma (using U.S. Census data for the latter). The Census' wage data shows that there are very real wage differences based on geographics areas within states, occupations, gender and race/ethnicity. However, the legislation calls for using aggregated data that does not account for these nuances. We are concerned that this could unfairly impact students and programs within institutions of higher education located in more rural areas of a state as well as programs preparing individuals for high skill, high demand professions that are predominately female and that are traditionally low paying. We urge the regulations to include more nuanced wage comparison thresholds, especially to ensure programs preparing students to work in rural communities across professions are not further disadvantaged.

Consideration #3: Regulations should be consistent with the Public Service Loan Forgiveness – or PSLF - program which was created to incentivize individuals to serve in professions providing important services to the public in areas of national need. Congress established the PSLF program to encourage individuals to go into professions providing essential services to the public. It recognizes that these are professions which require specialized preparation gained through higher education, are often low-paying, and have chronic workforce shortages across the country. If the low earning outcome provision were enacted across all programs this could impede students' access to federal student loans that allow them to pursue careers in areas of national need as defined by Congress in PSLF to include: early childhood education, military service, law enforcement, public education, public services for the elderly and adults with disabilities, public health, and several other fields. We believe the regulations should exempt programs preparing individuals for these professions from the low earning outcome provision. This would allow these individuals to access federal student loans, as intended through PSLF, and address workforce shortages in critical areas of national need.

Consideration #4: Given the high stakes of this provision and the new data collection and reporting that both higher education institutions and the Department will have to undertake, we urge the Department to establish a clear and consistent waiver process for the low earning outcome provision until at least July 1, 2028. Higher education institutions are deeply engaged in preparing for their first submission of data in September to comply with the Financial Value Transparency (FVT) requirements. The U.S. Department of Education has a large task ahead to process these data and prepare it for public reporting. Institutions will also need time to ensure that the data the Department returns are accurate, and they will need time to develop dashboards for their websites. Extending the implementation of the low-earnings provision will allow the Department and higher education institutions time to ensure debt to earnings metrics in the FVT are accurate and meaningful before implementing the low earning outcome provision. There is significant transparency in place already so that current and prospective students can make informed decisions about taking out student loans to support their postsecondary education goals. Higher education programs already publish wage data on their websites, including for ECE programs. Additionally, those entering many professions, such as ECE, are already well-aware of the wage earnings.

Consideration #5: Ensure that the AHEAD Committee includes representation from professions, like early childhood education, public education, and social work, which are high skill, high demand, but often low wage professions. It is essential that members of these professions are at the table to support the negotiators' understanding of the wide range of professions that could be impacted by the low earning outcomes

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provision and to develop regulations that take into account the nuances of wage data that will be used for comparisons.

Consideration #6: Ensure regulations clarify the definition of "professional student" with regard to provisions setting caps on federal student loan limits, and that it is inclusive of those who are enrolled in early childhood education graduate degree programs. Many early childhood educators, working in public preK and public school settings that require a professional license and rely on graduate degrees to access leadership positions in the profession that are higher paying.

Thank you for the opportunity to provide perspectives from the early childhood education profession to inform the creation of regulations for the higher education provisions. Should you have any questions or would like additional information, please contact Daniel Hains, Chief Policy and Professional Advancement Officer, at dhains@naeyc.org.

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[i] https://pubmed.ncbi.nlm.nih.gov/26269871/

[ii] Increasing Qualifications, Centering Equity: Experiences and Advice from Early Childhood Educators of Color (2019). NAEYC and The Education Trust. https://www.naeyc.org/sites/default/files/wysiwyg/user-74/increasing_qualifications_centering_equity.pdf; Centering Quality, Centering Equity: Lessons Learned in Increasing Early Childhood Educator Credentials. A joint report of The Institute for College Access & Success and the Georgetown University Center on Poverty and Inequality https://www.georgetownpoverty.org/wp-content/uploads/2024/07/Centering-Quality-Centering-Equity-report-July2024.pdf.

[iii] National Survey of Early Care and Education 2019,Child and Family Data Archive, available at https://www.childandfamilydataarchive.org/cfda/archives/cfda/studies/37941

[iv] TEACH Early Childhood National Center has partnerships in 23 states through which comprehensive scholarships are offered to ECE students to complete ECE degrees. Additionally, as students progress through their degree, they receive bonuses or raises through their ECE employer. Other states, such as Delaware and Washington have scholarship programs for ECE higher education students to help defray or fully cover the costs of obtaining an ECE degree.

[v] Wei, W., García, E., DiNapoli, M. A., Jr., Patrick, S. K., & Leung-Gagné, M. (2025). *In debt: Student loan burdens among teachers* [Brief]. Learning Policy Institute. **https://learningpolicyinstitute.org/product/student-loans-among-teachers-brief**

[vi] https://rapidsurveyproject.com/wp-content/uploads/2024/10/STUPN0432-Factsheet-Provider-student-loan-debt-240924.pdf

[vii] https://nces.ed.gov/use-work/resource-library/report/data-point/beginning-college-students-who-change-their-majors-within-3-years-enrollment